



BNP PARIBAS

Compliance Charter PT BNP Paribas Securities Indonesia

Consideration

1. The requirement to have a written Compliance Charter by the Financial Institution and Capital Market Supervisory Agency ("BapepamLK") under Rules No. V.D.3 on Internal Control.
2. To show the important of compliance function in assisting the company in managing its compliance risk, which can be defined as the risk of legal or regulatory sanctions, financial loss, or reputation risk as a result of its failure to comply with all applicable laws, regulations, codes of conduct and standards of good practice (together, "laws, rules and standards").
3. This Compliance Charter will serve as basic guidance for the company on the role and responsibilities of the compliance and to show the independency of the compliance function from the business activities.
4. This Compliance Charter should be read together in conjunction with *BNP Paribas Group Compliance Function Charter* issued on 2 December 2010.

Structure and Competency of Compliance Function

1. The compliance function is an independent function.
2. The compliance function is part of the company's organization structure and have a direct reporting line to the board of director

Roles and Responsibility of Compliance Function

1. To identify policy , standard operational procedures, and regulatory rules related to the company
2. To formalize policy and procedures on the main roles and responsibilities of compliance function
3. To ensure the compliance of the company with regard to the policy and the standard operational procedures
4. To ensure the compliance of the company with regard to the licensing in capital market industry
5. To ensure the compliance of the company with regard to the implementation of staff monitoring
6. To ensure the compliance of the company with regard to internal control
7. To ensure the compliance of the company with regard to preventing and combating anti money laundering and financing terrorism activities
8. To ensure the compliance of the company with regard to the rules on stock trading
9. To prevent the disclosure of confidentiality information by employee
10. To detect, prevent and handling conflict of interest
11. To supervise the account opening for new client
12. To supervise stock transactions including transactions for the interest of the company or its affiliate
13. To supervise the management of the company's portfolio
14. To supervise the distribution of all information, recommendation, advise, and/or research report issued by the company for its clients and/or which are distributed to the public
15. To supervise the recording and documentation, including keeping and preventing the disclosure of confidential data and information.
16. To become the contact person for all matter with regard to any investigation conducted by the regulator
17. To handle and administrate client's complaint
18. To supervise business continuity plan
19. To report on regular and incidental basis to the board of commissioners and/or board of directors
20. To provide guidance and/or training to relevant employee.
21. To report to the board of commissioner in the event the compliance detect an indication that the company, its staff members or its clients has breached the laws, rules and standards.

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Authority of Compliance Function

1. The Board of Directors and Board of Commissioners provide unlimited access of Compliance to other function's hardware and software to ensure the compliance of other functions with the laws, rules and standards.
2. To be able to communicate or report directly to the board of commissioner.
3. The authority and roles of Compliance Function binds all staffs including board of directors.

Principles of Action for Compliance Function

The BNP Paribas Group has set very high requirements in terms of compliance, and has established four guiding principles:

1. Individual responsibility

- i) Compliance is the responsibility of each and all;
- ii) It cannot be disassociated from any professional activity within the Group or in its name regardless of individual responsibilities or the Entity to which the person belongs;
- iii) The existence of a Compliance Function does not remove any individual employee's personal responsibility in all areas of compliance.

2. Exhaustiveness

- i) Compliance missions and responsibilities extend to the entire Group;
- ii) To fulfill its function in proper conditions, Compliance has access to all the necessary information at the various Entities.

3. Independence

- i) Group Compliance staff and delegates carry out their tasks in conditions guaranteeing their freedom of judgments and actions.

4. The rule of the "highest standards"

- i) In the area of the procedures and norms, Group Compliance rules will prevail over local rules whenever these rules are less strict or demanding.

Jakarta, 29 November 2011

Stipulated and Approved by the Board of Directors



Ronald Felt

President Director



Tan Anny Yalina

Director